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July 16, 2025

The Honorable LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom 4H North
Brooklyn, NY 11201

Re: USA v. Pham; Case No.: 1:24-cr-00359-LDH

Dear Judge Hall:

I am the attorney for Long Phi Pham in the above-referenced case. The Defendant respectfully writes to request a modification of his release conditions as follows:

Mr. Pham is requesting to travel to Houston, Texas on July 17th, 2025 and return to New York on July 20th, 2025, to visit with his cousin's wife, Elizabeth Nguyen, who has stage 4 breast cancer and will be undergoing surgery and chemotherapy in the upcoming days. He would like to visit and spend time with his cousin, his cousin's wife and their one year old daughter. His cousin's wife is currently at Memorial Hermann Texas Medical Center which is located at 6411 Fannin St., Houston, TX 77030.

Mr. Pham will be staying with his sister, Linh Pham, at her residence which is located at 20410 Salida Creek Cir., Cypress, TX 77433.

My office contacted Pretrial Services Electronic Monitoring Unit and the assigned AUSA David Berman about this request. Pretrial Services Electronic Monitoring Unit has consented, and the Government has deferred to Pretrial Services.

In light of the position of Pretrial and the Government, I respectfully request that this Honorable Court grant the Defendant's request without objection and modify his conditions of release as outlined above.

Thank you.

Respectfully,



Michael L. Soshnick, Esq.
Attorney for Defendant